# TECHNICAL REVIEW DOCUMENT FOR 2<sup>nd</sup> RENEWAL OF OPERATING PERMIT 980PWE204

to be issued to:

Nutri-Turf, LLC. Weld County Source ID 1230497

> James Geier October 2012

# I. Purpose

This document will establish the basis for decisions made regarding the Applicable Requirements, Emission Factors, Monitoring Plan and Compliance Status of Emission Units covered by the 2<sup>nd</sup> renewal Operating Permit proposed for this site. The original operating permit was issued October 1, 1999 and was renewed on June 1, 2004 and expired on June 1, 2009. This document is designed for reference during review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application submitted June 25, 2008. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <a href="http://www.cdphe.state.co.us/ap/Titlev.html">http://www.cdphe.state.co.us/ap/Titlev.html</a>. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

# **II.** Source Description

This facility is an auxiliary operation of the Anheuser-Busch, Inc., Fort Collins Brewery. A portion of the brewery wastewater is piped to this site for land application. The land is irrigated through center pivots with wastewater so that soil bacteria can break down the soluble organics and the vegetation can utilize the water and the nutrients. The production of brome grass, alfalfa, other grasses, wheat, and corn is sold. The Brewery operates under Operating Permit 95OPLR064.

This facility is located on County Road #15, in Weld County. The area is classified as a non-attainment area for ozone and attainment for all other pollutants. The classification to non-attainment for ozone occurred on November 20, 2007, when portions of Larimer and Weld counties were included in the 8-hour ozone non-attainment area. The landfarm is not subject to the Accidental Release Program provisions of 112(r). Wyoming is an affected state within 50 miles of the facility. There are two Federal Class I areas within 100 kilometers of the facility: Rocky Mountain National Park and Rawah National Wilderness Area.

When the Weld county area this source is located in was designated non-attainment for Ozone, sources over 100 TPY of VOC were required to submit a RACT report to evaluate emission controls applicable to the source. Nutri-Turf submitted a RACT report and it was determined that distillation for recovery of ethanol and microbial and vegetative destruction through land application for the purpose of growing crops represents RACT for treatment of brewery wastewater. (Requirements for distillation are set forth in 95OPLR064, issued to Anheuser-Busch, Fort Collins Brewery).

Facility wide emissions are as follows (tons per year):

<u>Pollutant</u>	<u>Actual</u>	<u>Potential</u>	
VOC	106.0	236.0	

Potential emissions are based on permitted levels. Actual emissions are based on the most recent AIRS inventory data.

Emissions associated with the Brewery are:

<u>Pollutant</u>	Potential (TPY)	Actual (TPY)
PM <sub>2.5</sub>	193	10
PM <sub>10</sub>	193	13
Nitrogen Oxides (NO <sub>x</sub> )	544	74
Sulfur Dioxide (SO <sub>2</sub> )	1410	2
Volatile Organic Compounds (VOC)	215	<200
Carbon Monoxide (CO)	100	22

Potential emissions are based on permitted emission levels. Actual emissions are based on the most recent AIRS inventory data. This source does not emit major amounts of any Hazardous Air Pollutants.

# II. Discussion of Modifications Made

# Source Requested Modifications

The permittee did not request any revisions to the Operating Permit in their renewal application, other than updating the responsible official and facility contact person. The company name was also changed from Nutri-Turf, Inc. to Nutri-Turf, LLC.

### Other Modifications

In addition to the changes requested by the permittee, the Division has included changes to make the permit consistent with recently issued permits, to include comments made by the EPA on other Operating Permits, to reflect updated and current Regulatory language, as well as to correct errors or omissions identified during review

of this renewal. The changes include the following:

- Update PSD/NSR description
- Condition 1.4 revised to say "demonstrated" instead of "monitored"
- Remove condition 2 and 3 from Section II. They are addressed elsewhere in the permit.
- Remove Regulation 7 permit shield since the area the source is located in in now non-attainment for ozone.